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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

JOHN CHAPMAN STOLLER, individually and in his
capacity as Grantor and Trustee of the John Chapman
Stoller Revocable Trust dtd 10/5/1988; SHEILA
PATRICIA STOLLER, individually and in her
capacity as Trustee of the John Chapman Stoller
Revocable Trust dtd 10/5/1988; and JOHN

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04714 (SMB)

CHAPMAN STOLLER REVOCABLE TRUST DTD
10/5/1988,
Defendants.

**STIPULATION AND ORDER FOR VOLUNTARY
DISMISSAL OF ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and Defendants John Chapman Stoller, individually and in his capacity as Grantor and Trustee of the John Chapman Stoller Revocable Trust dtd 10/5/1988, Sheila Patricia Stoller, individually and in her capacity as Grantor and Trustee of the John Chapman Stoller Revocable Trust dtd 10/5/1988, and John Chapman Stoller Revocable Trust dtd 10/5/1988, appearing *pro se*, (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 1, 2010, the Trustee filed and served the Complaint against Defendants.
2. On May 16, 2011, Defendants served an answer on the Trustee.
3. On January 20, 2017 the Parties entered into a settlement agreement pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [Dkt. No. 3181].
4. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee’s claims against Defendants in the above-captioned adversary proceeding and dismissal of the adversary proceeding with prejudice.

5. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original.

New York, New York
February 21, 2017

By: /s/ Nicholas J. Cremona
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LLC and the Estate of Bernard L. Madoff*

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Pro se

By: /s/ Sheila Patricia Stoller
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Pro se

By: /s/ John Chapman Stoller and Sheila Patricia Stoller, Trustees
JOHN CHAPMAN STOLLER REVOCABLE
TRUST DTD 10/5/1988

Pro se

SO ORDERED

Dated: February 21st, 2017
New York, New York

/s/ STUART M. BERNSTEIN
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE